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April 28, 2008

VIA ELECTRONIC FILING

Hon. Richard M. Berman
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Perez, Jose and Rosa v. Gaetano Amore, Freedom Rental, Freedom Rent A Car, Rosedale
Dodge, Inc. and Bergen Rent A Car, LLC
Insured: Freedom Rentals LLC
Index No.: 08-CV-2375 (RMB)
Our File No.: 117-13119-D-DMS/ODR
Handling Attorneys: Daniel M. Stewart

Honorable Sir:

This office represents all defendants in this matter. We have only partial opposition to plaintiff's Motion to Extend Time to serve the defendant-lessee Gaetano Amore.

This office represents Freedom Rental, Freedom Rent A Car, Rosedale Dodge, Inc. and Bergen Rent A Car, LLC pursuant to a contract of insurance. As co-defendant Amore simply rented a vehicle from Freedom Rent A Car, under the provisions of 49 USC 30106, that policy of insurance is also required to defend Amore only up to the minimum financial limits of the policy as defined by New Jersey State law.

This office is in no better position to locate Mr. Amore than plaintiff's counsel. The only records of Mr. Amore's whereabouts are his name and drivers' license number, the same information available to plaintiff. Service upon this office is no more likely to result in notification to Mr. Amore than any of the attempts put forth by plaintiff. As such, defendants oppose that portion of plaintiff's application seeking to satisfy service on Mr. Amore via service on our office.

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We will appear as scheduled tomorrow morning, April 29, 2008, at 9:15A.M.

Very truly yours,

WHITE FLEISCHNER & FINO, LLP

Daniel M. Stewart

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cc:

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